

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ASBESTOS PRODUCTS : CIVIL ACTION NO. MDL 875
LIABILITY LITIGATION (NO. VI) :

This document relates to all actions:

In Re Asbestos Products Liability
Litigation (No.: VI),

Certain Plaintiffs,

v.

Certain Defendants

FILED

JUN - 8 2015

MICHAEL E. KUNZ Clerk
By _____ Dep. Clerk

MDL DOCKET:
(MARDOC)

Civil Action No.: 2:02-md-875

**STIPULATION AS TO VICTORY CARRIERS, INC.
IN CERTAIN CASES¹**

It is hereby stipulated between counsel for Plaintiffs and counsel for Defendant Victory Carriers, Inc., in each of the cases on the attached Exhibit A, that (1) Defendant Victory Carriers, Inc. is deemed to have filed motions to dismiss based on lack of personal jurisdiction in Ohio, and (2) consistent with the Court's prior Orders dismissing Victory Carriers, Inc. for lack of personal jurisdiction (e.g., MDL Doc. No. 3045, 08/26/13; Doc. No. 4195-1, 03/12/14), the Court may enter an Order pursuant to Rule 12(b)(2), dismissing plaintiffs' claims against VICTORY CARRIERS, INC. (and, where used by plaintiffs, the misnomer VICTORY CARRIERS STEAMSHIP CO.) ONLY in each of the cases on the attached list, for lack of personal jurisdiction, without prejudice and without consideration, each party to bear its own costs.

So stipulated this 5th day of June, 2015.

¹ See Exhibit A for list of cases.

/s/John E. Herrick

John E. Herrick

Motley Rice LLC

28 Bridgeside Blvd

Mt. Pleasant, SC 29464

O 843-216-9000

F 843-216-9450

jherrick@motleyrice.com

Attorney for Plaintiffs

/s/Harold W. Henderson (with permission)

Harold W. Henderson

Thompson Hine LLP

127 Public Square, Suite 3900

Cleveland, OH 44114-1291

O 216-566.5779

F 216-566-5800

hal.henderson@thompsonhine.com

Attorney for Defendant Victory Carriers, Inc.

IT IS SO ORDERED:

Date

6/8/15

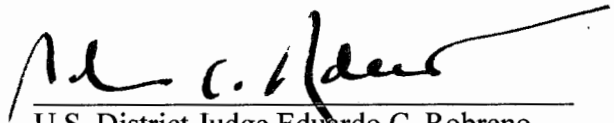

U.S. District Judge Eduardo C. Robreno

EXHIBIT A

Civil Action No.	Name
2:11CV30170	Bowden, Jr., Augustus W
2:10CV54522	Rivera, Francisco
2:11CV32306	Spencer, Jim L
2:11CV33303	Clark, Terrill G